

# DRAFT

## EVALUATION REPORT

**KLR Venture LLC  
20450 Hesperian Blvd.  
Hayward, CA 94541  
GDF#11373  
Application #11218**

### **BACKGROUND**

KLR Venture LLC has submitted this application to increase the throughput limit at G11373. No hardware modification has been proposed at this time. The baseline throughput for the station is zero (0).

A risk screen performed for this application indicates that an increase of 11.3 million-gallons/year throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to 11.3 million gallons/year pursuant to condition #13342 .

This station is within 1,000 feet of St. Joachim School, triggering the Public Notice requirements of the Waters Bill. There are no other schools within ¼ mile of this station.

Before the throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above schools and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

### **EMISSION CALCULATIONS**

Emission factors are taken from the Gasoline Service Station Industrywide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 11.3 million gal/yr is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned}\text{Emissions increase:} \quad (11.3 \text{ million gal/yr})(1.27 \text{ \#VOC/1000 gal}) &= 14351 \text{ \#/year} \\ &= 39.32 \text{ \#/day} \\ &= 7.18 \text{ tpy}\end{aligned}$$

$$\begin{aligned}\text{Benzene emissions increase:} \quad &(\text{emission rate, } 9.73\text{E-}5 \text{ g/sec per million gallons}) \\ &* (86400 \text{ sec/day}) \\ &* (365 \text{ day/year}) \\ &* (0.0022 \text{ lb/g}) \\ &* (11.3 \text{ million gallons increase}) \\ &= 76.28 \text{ lb/year}\end{aligned}$$

### **NEW SOURCE REVIEW**

This station will emit more than 10# of VOC in a single day. Thus the BACT requirement of Regulation 2-2-301 is triggered.

BACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

Emissions from this station will remain less than 10 tpy. Per Regulation 2-2-302, offsets are not required.

## **TBACT**

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment. TBACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

## **COMPLIANCE**

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-102E and G-70-17AD.

### **A. Permits – General Requirements, Regulation 2, Rule 1**

The facility is located within 1,000 feet of the outer boundary of St. Joachim School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned schools and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

### **B. Permits – New Source Review, Regulation 2, Rule 2**

1. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.
2. **California Environmental Quality ACT (CEQA), Regulation 2-1-311:** This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3 and therefore is not discretionary as defined by CEQA.

### **C. Fees – Regulation 3**

All applicable fees have been paid.

**RECOMMENDATION**

It is recommended that a P/O be granted to this station upon completion of the Public Comment period.

by: \_\_\_\_\_  
Lorna O. Santiago  
Air Quality Technician

Date: \_\_\_\_\_